

### REMARKS

Claims 1-21 are pending in the present application. Claims 1, 8 and 15 have been amended herewith. Reconsideration of the claims is respectfully requested.

#### **I. 35 U.S.C. § 102, Anticipation**

The Examiner rejected Claims 1, 3, 8, 10, 15 and 17 under 35 U.S.C. § 102(e) as being anticipated by Berglund et al. (US 6,044,411). This rejection is respectfully traversed.

With respect to Claims 1, 8 and 15, Applicants have amended such claims to recite that the physical addresses used when accessing devices contained within said plurality of input/output drawers do not change when reconfiguring at least one of said plurality of input/output drawers within the data processing system by physical insertion, physical removal or physical rearrangement. Applicants show that Berglund teaches that his physical addresses are composed using the *actual physical locations* of its components, in order to enhance the ability to locate the physical location of a device (Berglund Col. 2, lines 49-53, Col. 4, lines 22-24 and lines 37-52). As described at Berglund Col. 7, lines 12-39, when the system is turned on, the SPCN writes *unique physical location addresses* into the respective memory, specifying the associated enclosure and the particular backplane. The operating system reads the enclosure/backplane physical location address information when building a mapping of logical addresses to physical location addresses (Berglund Col. 7, lines 49-56). Thus, it is shown that since Berglund uses actual physical device location information when constructing its logical address mapping, the physical addresses used when accessing a device *do change* when the device is re-cabled to be at another physical location within the system, since the physical address used to access the device is comprised of its physical enclosure/tower location information (Col. 4, lines 40-43) which would change when the device is re-cabled. See, in particular, Berglund's discussion at Col. 8, lines 42-52, where Berglund describes this exact scenario (and reproduced herein):

"In some systems, such as those having multiple buses, it is advantageous to store bus identification information in non-

volatile memory (NVRAM) associated with the backplane. In this way, *should an enclosure be removed and relocated at a different position on the main bus*, that is, be at a different logical bus "drop" point, a unique bus identifier persists in the NVRAM, so that system bus configuration information can be maintained *and updated* in the operating system and NVRAM. (emphasis added by Appellants)

This is in contrast to the claimed invention, where techniques for identifying or accessing devices contained within the drawers *do not change* when the drawers are relocated to a different position on the system bus by re-cabling, since a unique identifier is used by the operating system to identify the drawers regardless of how the input/output drawers are interconnected by cable.

Appellants further show that it would not have been obvious to modify the teachings of Berglund in accordance with the claimed invention, due to Berglund's expressed desire of providing a system where the physical address location information used for identifying devices by the operating system do change when a device is relocated to a different position such as by re-cabling, so that it is easier to locate the device for serviceability (Berglund Col. 4, lines 30-52).

Applicants traverse the rejection of Claims 3, 10 and 17 for similar reasons to those given above regarding Claims 1, 8 and 15, of which these Claims 3, 10 and 17 depend upon, respectively.

Therefore, the rejection of Claims 1, 3, 8, 10, 15 and 17 under 35 U.S.C. § 102 has been overcome.

## II. 35 U.S.C. § 103, Obviousness

A. The Examiner rejected Claims 2, 9 and 16 under 35 U.S.C. § 103 as being unpatentable over Berglund (US 6,044,411) and further in view of Sidhu et al. (US 5,884,322). This rejection is respectfully traversed for similar reasons to those given above regarding Claims 1, 8 and 15, of which these Claims 2, 9 and 16 depend upon, respectively.

B. The Examiner rejected Claims 4, 6, 7, 11, 13, 14, 18, 20 and 21 under 35 U.S.C. § 103 as being unpatentable over Berglund (US 6,044,411) and Sidhu et al. (US 5,884,322) and further in view of Lortz et al. (US 6,041,364). This rejection is respectfully traversed for similar reasons to those given above regarding Claims 1, 8 and 15, of which these Claims 2, 9 and 16 ultimately depend upon, respectively.

C. Therefore, the rejection of Claims 2, 4, 6, 7, 9, 11, 13, 14, 16, 18, 20 and 21 under 35 U.S.C. § 103 has been overcome.

### III. Claims 5, 12 and 19

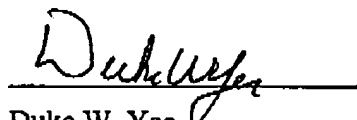
In the most recent Office Action dated 09/17/2003, no statutory basis of rejection was given by the Examiner regarding Claims 5, 12 and 19. Further clarification is requested regarding the status of these claims.

### IV. Conclusion

It is respectfully urged that the subject application is patentable over the cited references and is now in condition for allowance. The Examiner is invited to call the undersigned at the below-listed telephone number if in the opinion of the Examiner such a telephone conference would expedite or aid the prosecution and examination of this application.

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Respectfully submitted,



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